

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

No. CR 19-

1820-MV

CHRISTOPHER DELGADO,

Defendant.

SECOND UNOPPOSED MOTION TO CONTINUE TRIAL

Defendant Christopher Delgado, by and through counsel, Joe M. Romero, Jr., hereby moves the Court for a second Order continuing the Trial currently set for 9:00 a.m. on November 18, 2019, before the Honorable Martha Vazquez, and as grounds therefore states:

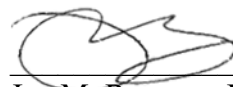
1. The parties are actively in negotiations and working diligently towards attempting to resolve this case without the need to proceed to trial.
2. This motion is not predicated upon the congestion of the Court's docket.
3. Defendant Delgado is not in custody and has been fully compliant with his conditions of release.
4. Defendant Delgado does not object to this time period being excluded in computing the time within which the trial must commence pursuant to 18 U.S.C. §3161 (h)(7)(A), as such delay would avail the parties of the opportunity to resolve this case without the need and risk of proceeding to trial.

5. Defendant Delgado seeks a continuance of no less than sixty (60) days in order to ensure that the parties can finalize their pre-trial negotiations in this case, which negotiations are aimed at securing a pre-trial resolution of this case.

6. Opposing counsel, AUSA Paul Schied, concurs with this motion.


WHEREFORE, Defendant Delgado respectfully requests that the Court enter an Order Continuing the Trial currently set in this case for 9:00 a.m. on November 18, 2019.

Respectfully Submitted,



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The foregoing pleading was served on opposing counsel via the Court's CM/ECF electronic document filing and delivery service on the date indicated in the court-affixed header.



Joe M. Romero, Jr.